

SUPERVISION of PHYSICIAN ASSISTANTS

A change to the law has made it easier for a physician to work with a physician assistant (PA). Medical Board approval to supervise a PA is no longer necessary. While the supervisory approval requirement has changed, the duties and responsibilities of supervising a PA have not changed.

Supervisory Requirements

Listed below are some of the PA supervisory requirements.

- According to California law, all care provided to a patient by a physician assistant is the ultimate responsibility of the supervising physician.
- Current law limits a physician to supervising no more than two physician assistants (PAs) at any moment in time. *(Physicians who work in designated medically underserved areas may supervise up to four PAs. Please call the PAC office at (916) 263-2670 for information concerning this program.)*
- According to regulations, the physician must be in the same facility with the PA or be immediately available by electronic communications.
- Before authorizing a PA to perform any medical procedure, the physician is responsible for evaluating the PA's education, experience, knowledge, and ability to perform the procedure safely and competently. In addition, the physician should verify that a PA has a current California license issued by the Physician Assistant Committee (PAC) (This information is available on the PAC website: www.physicianassistant.ca.gov)
- PAs may not own a medical practice. (Please see Section 13400 and following of the Corporations Code.)
- PAs may not hire their supervisors. PAs are dependent practitioners who act as agents on behalf of a supervising physician.

Physicians who plan to supervise PAs should carefully review Section 1399.545 of Title 16 of the California Code of Regulations for a complete listing of supervision requirements. This information is available on the Physician Assistant Committee website www.physicianassistant.ca.gov.

There are four methods for providing the supervision required by Section 1399.545 of the Physician Assistant Regulations:

1. The physician sees the patients the same day that they are treated by the PA.
2. The physician reviews, signs and dates the medical record of every patient treated by the physician assistant within thirty days of the treatment.
3. The physician adopts written protocols which specifically guide the actions of the PA. The physician must select, review, sign and date at least 10% of the medical records of patients treated by the physician assistant according to those protocols within 30 days.
4. Or, in special circumstances, the physician provides supervision through additional methods which must be approved in advance by the PAC.

To fulfill the required supervisor obligation, the physician must utilize one or a combination of the four authorized supervision methods.

Delegation of Services Agreement

For the mutual benefit and protection of patients, physicians and their PAs, the PA regulations require the physician to delegate in writing, for each supervised physician assistant, those medical services which the PA may provide. That document is often referred to as a Delegation of Services Agreement (available on the PAC website www.physicianassistant.ca.gov). Medical tasks which are delegated by a supervising physician may only be those that are usual and customary to the physician's personal practice.

Drug Orders

- Pharmacy Law (Business and Professions Code Section 4000 et seq.) authorize licensed pharmacists to dispense drugs or devices based on a PA's "drug order". Current law also allow PAs to obtain their own DEA numbers for use when writing prescription drug orders for controlled medications.
- Current law permits physician assistants to write and sign prescription drug orders when authorized to do so by their supervising physicians for Schedule II-V medication.
- A PA may only administer, provide, or transmit a drug order for Schedule II through Schedule V controlled substances with the advance approval by a supervising physician for a specific patient.
- In order to ensure that a PA's actions involving the prescribing, administration or dispensing of drugs is in strict accordance with the directions of the physician, every time a PA administers or dispenses a drug or transmits a Schedule II drug order, the physician supervisor must sign and date the patient's medical record or drug chart within seven days.

For physicians interested in utilizing physician assistants and who would like to know more about the benefits and requirements, several publications are available from the PAC, including:

Physician Assistant Laws and Regulations
Sample Delegation of Services Agreement
Drug Orders by Physician Assistants (information bulletin)
What is a PA? (patient information brochure - English & Spanish)

To request publications or to verify physician assistant licensing information, contact:

Physician Assistant Committee
1424 Howe Avenue, Suite 35
Sacramento, CA 95825-3217

Telephone: (916) 561-8780
FAX: (916) 263-2671
Website: www.physicianassistant.ca.gov

This article has highlighted many of the key responsibilities a physician assumes when approved to utilize physician assistants. It does not cover all the requirements of law. This is not a declaratory opinion of the Physician Assistant Committee or the Medical Board of California.